

### C. Remarks

The claims are 1-28, with claims 1, 17, 20, 22, 25, 26 and 28 being independent. New claim 28 has been added to give Applicants a more complete scope of coverage. The new claim is supported by the application as filed; Applicants submit that no new matter has been added. Reconsideration of the present claims is respectfully requested.

Claims 1-5, 9-17, 20, 22 and 24 stand rejected under 35 U.S.C. §102(e) as being anticipated by Askeland (U.S. Patent No. 6,254,217). Claims 25-27 stand rejected under 35 U.S.C. §103(a) as being obvious over Askeland in view of Mizutani (U.S. Patent No. 5,774,146). Claims 6-8, 18, 19, 21 and 23 stand rejected under 35 U.S.C. §103(a) as being obvious over Askeland in view of Matsufuji (U.S. Patent No. 4,593,295). Applicants respectfully traverse these rejections.

All of Applicants' previously set forth arguments are incorporated by reference herein. Further, Applicants would like to more completely address the Examiner's allegation that the "changing means" of instant claim 1 is disclosed in Askeland at column 17, lines 5-9. The cited portion of Askeland refers to the use of mask patterns for the forward and rearward print masks which vary the order in which drops of different color inks are deposited for different pixel locations printed with a composite color. Specifically, in the forward scan, inks of plural colors are applied in a predetermined order onto positions determined by the forward print mask to print a composite color, while in the rearward scan, inks of plural colors are applied in a reverse order onto positions determined by the rearward print mask to print a composite color. In other words, pixels of composite color printed by applying the inks of plural colors in the

predetermined order and pixels of composite color printed by applying the inks of plural colors in the reverse order are determined by the forward print mask and the rearward print mask, respectively. Accordingly, pixels printed by applying the inks of plural colors in different ink application orders are mixed, but each pixel is in a position determined by the mask pattern. It is clear, then, that Askeland, contrary to the Examiner's allegation, is silent about at least one key feature of the present invention, namely, that the order of application of inks of plural colors to a particular pixel area is changed.

What is more, according to Askeland's printer, when a dot to be recorded is absent on positions where ink drops are thinned by the mask pattern, all the inks of plural colors are applied in the same order to print the pixels of the composite color. On the other hand, according to the present invention, the order of application of inks is not determined by a mask pattern, but instead can be changed for each pixel, so that pixels printed by changing the order of application of inks are mixed even then.

Mizutani does not remedy the deficiencies of Askeland; there is no disclosure of changing the order of application of inks of plural colors to a particular pixel area to address hue unevenness therein. Mizutani merely discloses that a RAM is utilized as a general print buffer. The present invention, additionally by contrast, is characterized in that data are stored into a plurality of buffers and the buffers are selectively used so as to change the order of the application of inks. Mizutani is silent in that regard.

Matsufuji does not remedy the deficiencies of Askeland either; there is no disclosure of changing the order of application of inks of plural colors to a particular pixel area to address hue unevenness therein. Matsufuji shows recording heads in which color arrangement is symmetric. However, in Matsufuji, dots are recorded by different orders of

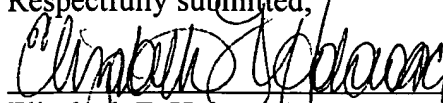
application of inks regularly according to a determined pattern. At best, the combination of Matsufuji and Askeland suggest an apparatus that records dots of composite color different in color overlapping order onto positions determined by arrangement of nozzles of a recording head or dots of composite color different in color overlapping order onto positions determined by forward and rearward print patterns.

In sum, it is clear that the present invention is not anticipated or rendered obvious by any of Askeland, Mizutani and Matsufuji, whether those references are considered alone or in some combination. There is simply no disclosure or suggestion of at least one key feature of the presently claimed invention - changing the order of application of inks of plural colors to a particular pixel area to address hue unevenness. Accordingly, Applicants respectfully request withdrawal of the prior art rejections.

In view of the foregoing amendments and remarks, favorable reconsideration and passage to issue of the present case is respectfully requested. If, upon consideration of this paper, the Examiner believes there are any outstanding issues, it is respectfully requested that the Examiner contact the undersigned attorney in an effort to expeditiously resolve such issues.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Elizabeth F. Holowacz", written over a horizontal line.

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